Sweet

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EASTSIDE HOLDINGS INC., individually and on behalf of all others similarly situated,

Plaintiff.

V.

THE BEAR STEARNS COMPANIES INC., JAMES E. CAYNE, ALAN D. SCHWARTZ, WARREN J. SPECTOR, SAMUEL L. MOLINARO, JR. and ALAN C. GREENBERG.

Defendants.

RAZILL C. BECHER, individually and on behalf of all others similarly situated,

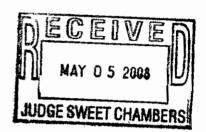
Plaintiff.

٧.

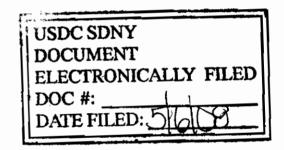
THE BEAR STEARNS COMPANIES INC., JAMES E. CAYNE, ALAN D. SCHWARTZ, WARREN J. SPECTOR, SAMUEL L. MOLINARO, JR. and ALAN C. GREENBERG,

Defendants.

08 CV 2793 (RWS)



08 CV 02866 (RWS)



STIPULATION AND [PROPOSED] ORDER

WHEREAS, the complaint in Eastside Holdings Inc. v. The Bear Stearns
Companies Inc., et al. was filed on March 17, 2008;

WHEREAS, the complaint in Becher v. The Bear Stearns Companies Inc., et al. was filed on March 18, 2008;

WHEREAS, there have been no previous requests for an extension of time to answer, move against, or otherwise respond to the complaints served in the above-captioned actions;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties to these actions, as follows:

- Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the complaints in the above-captioned actions;
- Plaintiffs shall have sixty (60) days from the entry of the order pursuant to the Private Securities Litigation Reform Act appointing Lead Plaintiff(s) and Lead
 Counsel to serve and file a consolidated amended complaint (the "Complaint");
- Defendants shall have sixty (60) days to answer, move against, or otherwise respond to the Complaint;
 - 4. In the event Defendants move to dismiss the Complaint:
- (a) Plaintiffs shall have sixty (60) days from the date such motion is served to serve and file opposition papers; and
- (b) Defendants shall have forty-five (45) days from the date opposition papers are served by plaintiffs to serve and file reply papers.

IT IS FURTHER STIPULATED AND AGREED that nothing herein shall

be deemed to constitute a waiver of any defenses in this action. Defendants reserve all arguments and defenses in the above-captioned actions.

Dated: April <u>30</u>, 2008 New York, New York

PAUL, WEISS, RIFKIND, WHARTON &

GARRISON LLP

By:

Brad S. Karp (bkarp@paulweiss.com)

Eric S. Goldstein (egoldstein@paulweiss.com)

1285 Avenue of the Americas

New York, New York 10019-6064

Tel. (212) 373-3000

Fax (212) 757-3980

Attorneys for Defendant The Bear Stearns Companies Inc.

KRAMER LEVIN NAFTALIS & FRANKEL LLP

Bv:

Barry H. Berke (bberke@kramerlevin.com)

David S. Frankel (dfrankel@kramerlevin.com)

1177 Avenue of the Americas

New York, New York 10036

Tel. (212) 715-9100

Fax (212) 715-8000

Attorneys for Defendant James E. Cayne

Page 4 of 8

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Jay Kasner (jay.kasner@skadden.com)

Susan Saltzstein (susan.saltzstein@skadden.com)

4 Times Square

New York, New York 10036-6522

Tel. (212) 735-3000 Fax (212) 735-2000

Attorneys for Defendant Alan D. Schwartz

SIMPSON THACHER & BARTLETT LLP

By: Michael Chepiga (mchepiga@stblaw.com)

425 Lexington Avenue New York, New York 10017

Tel. (212) 455-2000 Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

SCHULTE ROTH & ZABEL LLP

By: _______ Alan Glickman (alan.glickman@srz.com)

919 Third Avenue

New York, New York 10022

Tel. (212) 756-2000

Fax (212) 593-5955

Attorneys for Defendant Alan C. Greenberg

SKADDEN,	ARPS,	SLATE,	MEAGHER	æ
FLOMILE				

By: Jay Kasner (jay.kasner@skadden.com) Susan Saltzstein (susan.saltzstein@skadden.com) 4 Times Square New York, New York 10036-6522 Tel. (212) 735-3000 Fax (212) 735-2000 Attorneys for Defendant Alan D. Schwartz SIMPSON THACHER & BARTLETT LLP

Will of Rustle 2 Michael Chepiga (mchepiga@stblaw.com)

W: 11:an T. Russell, Tr. (wrissell e stbliw.com)

425 Lexington Avenue New York, New York 10017 Tel. (212) 455-2000 Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

SCHULTE ROTH & ZABEL LLP

By: Alan Glickman (alan.glickman@srz.com)

919 Third Avenue New York, New York 10022 Tel. (212) 756-2000

Fax (212) 593-5955

Attorneys for Defendant Alan C. Greenberg

Page 6 of 8

SKADDEN, ARPS,	SLATE,	MEAGHER	&
FLOMILE			

By: Jay Kasner (jay.kasner@skadden.com) Susan Saltzstein (susan.saltzstein@skadden.com)

4 Times Square New York, New York 10036-6522

Tel. (212) 735-3000 Fax (212) 735-2000

Attorneys for Defendant Alan D. Schwartz

SIMPSON THACHER & BARTLETT LLP

By:_ Michael Chepiga (mchepiga@stblaw.com)

425 Lexington Avenue New York, New York 10017 Tel. (212) 455-2000

Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

SCHULTE ROTH & ZABEL LLP

Alan Glickman (alan.glickman@srz.com)

919 Third Avenue

New York, New York 10022

Tel. (212) 756-2000 Fax (212) 593-5955

Attorneys for Defendant Alan C. Greenberg

	WACHTELL, LIPTON, ROSEN & KATZ
	By: Dip.M
	Lawrence B. Pedowitz (LBPedowitz@wlrk.com) David B. Anders (DBAnders@wlrk.com)
	51 West 52nd Street
	New York, New York 10019
	Tel. (212) 403-1000
	Fax (212) 403-2000
	Attorneys for Defendant Warren J. Spector
	COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP
	Ву:
	Samuel H. Rudman (SRudman@csgrr.com) David A. Rosenfeld (DRosenfeld@csgrr.com)
	58 South Service Road, Suite 200
	Melville, New York 11747
	Tel. (631)367-7100
	Fax (631)367-1173
	COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP
	Darren J. Robbins (darrenr@csgrr.com)
	David C. Walton (davew@csgrr.com)
	Catherine J. Kowalewski (katek@csgrt.com)
	655 West Broadway, Suite 1900
	San Diego, California 92101
	Tel. (619)231-1058
	Fax (619)231-7423
	Attorneys for Plaintiffs Eastside Holdings, Inc. and Razill C. Bechei
SO ORDERED:	
U.S.D.J	

WACHTELL, LIPTON, ROSEN & KATZ

By:_ Lawrence B. Pedowitz (LBPedowitz@wlrk.com) David B. Anders (DBAnders@wlrk.com)

51 West 52nd Street New York, New York 10019

Tel. (212) 403-1000 Fax (212) 403-2000

Attorneys for Defendant Warren J. Spector

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP

By: Mario alla

Samuel H. Rudman (SRudman@csgrr.com) David A. Rosenfeld (DRosenfeld@csgrr.com) Mario Alba (MAlba@csgrr.com)

58 South Service Road, Suite 200 Melville, New York 11747

Tel. (631)367-7100 Fax (631)367-1173

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP

Darren J. Robbins (darrenr@csgrr.com) David C. Walton (davew@csgrr.com) Catherine J. Kowalewski (katek@csgrr.com)

655 West Broadway, Suite 1900

San Diego, California 92101

Tel. (619)231-1058 Fax (619)231-7423

Attorneys for Plaintiffs Eastside Holdings, Inc. and Razill C. Becher

SO ORDERED